

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>IN RE:</b>  <b>KRISJENN RANCH, LLC, <i>et al</i></b>  <b>DEBTOR</b>	§ § § § §	<b>CHAPTER 11</b>  <b>CASE NO. 20-50805-rbk</b>  <b>(Jointly Administered)</b>
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**KRISJENN RANCH, LLC, KRISJENN RANCH LLC, SERIES UVALDE RANCH, AND  
KRISJENN RANCH, LLC, SERIES PIPELINE ROW'S AGREED MOTION TO RESET  
HEARING ON DEBTORS' DISCLOSURE STATEMENT**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

KrisJenn Ranch, LLC, KrisJenn Ranch LLC, Series Uvalde Ranch, and KrisJenn Ranch, LLC, Series Pipeline Row (collectively, the “Debtors”), the Debtors and Debtors-in-Possession in the above captioned case, hereby file this Agreed Motion to Reset Hearing on Debtors’ Disclosure Statement (the “Motion”) and in support of this Motion, the Debtors respectfully represent as follows:

1. On April 27, 2020 (the “Petition Date”), Debtors filed a joint voluntary petition for relief under Chapter 11 of Title 11 of the United States Code.
2. On April 29, 2020, DMA and Borders filed an Amended Motion to Sever or Dismiss seeking to split the joint filing into three separate bankruptcy filings [Dkt. No. 22].
3. The motion to sever was granted on June 5, 2020—splitting the joint bankruptcy filing into the three separate cases [Dkt. No. 47].
4. On July 12, 2021, Debtors filed their Consolidated Plan of Reorganization [Dkt. No. 123] and Joint Disclosure Statement to Substantively Consolidated Plan of Reorganization (“Disclosure Statement”) [Dkt. No. 124] into Cause No. 20-208050-rbk, the primary bankruptcy case.

5. On July 19, 2021, Debtors filed amended plans of reorganization and disclosure statements into debtors' respective bankruptcy filings at the Court's request [Dkt. Nos. 129, 130].

6. The Court set the hearing on Debtors' Disclosure Statement for August 4, 2021.

7. On July 27, 2021, counsel for the main creditor in this matter—McLeod Oil—contacted Debtors' counsel with substantive concerns regarding Debtors' Disclosure Statement and concerns regarding whether McLeod had sufficient time to respond to the disclosure statement.

8. Counsel for both Debtor and McLeod wish to work through McLeod's concerns regarding the disclosure statement.

9. For this reason, Debtors believe good cause exists to reset the hearing on Debtors' Disclosure Statement by thirty (30) days. Holding a hearing on Debtors' Disclosure Statement prior to Debtors thoroughly understanding and addressing McLeod's concerns will likely lead to additional amendments causing unnecessary expenses to befall Debtors' estates.

10. Based on the above issue, Debtors requests the Court reset the hearing on Debtors' Disclosure Statement by thirty (30) days.

WHEREFORE, Debtors respectfully request that the Court enter an Order resetting the hearing on Debtors' Disclosure Statement for thirty (30) days and grant Debtors all other relief they are justly entitled.

Dated: July 30, 2021

Respectfully submitted,

By: /s/ Ronald J. Smeberg

RONALD J. SMEBERG  
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ATTORNEY FOR DEBTORS

**CERTIFICATE OF CONFERENCE**

I hereby certify that on July 29, 2021, I Conferenced with counsel for McLeod Oil, either by phone or via email regarding this motion. McLeod Oil is in agreement with this motion.

**CERTIFICATE OF SERVICE**

I hereby certify that on July 30, 2021, true and correct copies of the foregoing motion will be forwarded electronically via the Court's ECF System, or by U.S. first class mail, postage prepaid, on, all parties listed on the attached Service List.

/s/ Ronald J. Smeberg  
RONALD J. SMEBERG

**SERVICE LIST**

**DEBTOR**

KrisJenn Ranch, LLC  
410 Spyglass Rd  
Mc Queeney, TX 78123-3418

**GOVERNMENT ENTITIES**

Office of the UST  
615 E Houston, Room 533  
PO Box 1539  
San Antonio, TX 78295-1539

U.S. Attorney  
Attn: Bkey Division

601 NW Loop 410, Suite 600  
San Antonio, Texas 78216

Internal Revenue Services  
Special Procedures Branch  
300 E. 8<sup>th</sup> St. STOP 5026 AUS  
Austin, TX 78701

Texas Comptroller of Public  
Account  
Attn: Bankruptcy  
P.O. Box 149359  
Austin, TX 78714-9359

Angelina County Tax Assessor

606 E Lufkin Ave,  
Lufkin, Texas 75901

Nacogdoches County Tax  
Assessor Collector  
101 West Main Street  
Nacogdoches, Texas 75961

Rusk County  
202 N Main St,  
Henderson, Texas 75652

Shelby County, Tax Collector  
200 St. Augustine St.

Center, Texas 75935

Tenaha ISD Tax Assessor-  
Collector  
138 College St  
Tenaha, TX 75974-5612

Uvalde Tax Assessor  
Courthouse Plaza, Box 8  
Uvalde, Texas 78801

**NOTICE PARTIES**

METTAUER LAW FIRM  
c/o April Prince  
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Austin, Texas 78746

**SECURED CREDITORS**

McLeod Oil, LLC  
c/o John W. McLeod, Jr.  
700 N Wildwood Dr  
Irving, TX 75061-8832

**UNSECURED CREDITORS**

Bigfoot Energy Services

312 W Sabine St  
Carthage, TX 75633-2519

C&W Fuels, Inc.  
Po Box 40  
Hondo, TX 78861-0040

Davis, Cedillo & Mendoza  
755 E Mulberry Ave Ste 500  
San Antonio, TX 78212-3135

Granstaff Gaedke & Edgmon  
5535 Fredericksburg Rd Ste 110  
San Antonio, TX 78229-3553

Hopper's Soft Water Service  
120 W Frio St  
Uvalde, TX 78801-3602

Larry Wright  
410 Spyglass Rd  
Mc Queeney, TX 78123-3418

Medina Electric  
2308 18th St.  
Po Box 370  
Hondo, TX 78861-0370

Medina's Pest Control  
1490 S Homestead Rd  
Uvalde, TX 78801-7625

Texas Farm Store  
236 E Nopal St  
Uvalde, TX 78801-5317

Uvalco Supply  
2521 E Main St  
Uvalde, TX 78801-4940

Longbranch Energy  
c/o DUKE BANISTER  
RICHMOND  
Po Box 175  
Fulshear, TX 77441-0175

DMA Properties, Inc.  
896 Walnut Street at US 123  
BYP  
Seneca, SC 29678